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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BAKER RANCHES, INC., a Nevada
Corporation; DARWIN C. WHEELER; OWEN
L. AND PATRICIA T. GONDER; DAVID
JOHN ELDRIDGE AND RUTH ELDRIDGE,
as Co-Trustees of the DAVID JOHN
ELDRIDGE AND RUTH ELDRIDGE FAMILY
LIVING TRUST, dated January 31, 2007;
ZANE JORDAN; and JUDEE SCHALEY,

Plaintiffs,

v.

DAVID BERNHARDT, in his official capacity
as Acting Secretary of the United States
Department of the Interior, the UNITED
STATES DEPARTMENT OF THE INTERIOR,
MICHAEL T. REYNOLDS, in his official
capacity as Acting Director of the National
Park Service, the NATIONAL PARK SERVICE,
and JAMES WOOLSEY, in his official
capacity as Superintendent of the Great
Basin National Park,

Defendants.

Case No. 3:18-cv-00261-RFB-CLB

**STIPULATION TO
EXTEND DEADLINE TO
FILE PRETRIAL ORDER
(Fifth Request)**

Pursuant to LR IA 6-1, Plaintiffs, by and through their undersigned counsel Debbie Leonard of Leonard Law, P.C. and Brandon L. Jensen of the Budd-Falen Law Offices, LLC, and Defendants, by and through their undersigned counsel Katharine Laubach of the United States Department of Justice, stipulate and agree as follows:

On September 1, 2022, the Court issued an Order on the parties' motions for summary judgment (ECF No. 57) and ordered the parties to submit a proposed joint pretrial order for a bench trial by September 23, 2022.

On September 19, 2022, the parties filed a stipulation to extend the time to file the joint pretrial order in light of the parties' settlement discussions (ECF No. 58). The Court entered its order on the stipulation on September 21, 2022 (ECF No. 59), making the new deadline November 22, 2022.

On November 16, 2022, the parties filed a second stipulation to extend the time to file the joint pretrial order in light of the parties' continued settlement discussions (ECF No. 60). The Court entered its order on the stipulation on the same date (ECF No. 61), making the new deadline January 23, 2023.

On January 18, 2023, the parties filed a third stipulation to extend the time to file the joint pretrial order in light of the parties' continued settlement discussions (ECF No. 64). The Court entered its order on the stipulation on January 20, 2023 (ECF No. 65), making the new deadline March 24, 2023.

On March 22, 2023, the parties filed a fourth stipulation to extend the time to file the joint pretrial order to discuss and reach agreement on the stipulated findings of fact and conclusions of law following their unsuccessful settlement discussions (ECF No. 66). The Court entered its order on the stipulation on March 24, 2023 (ECF No. 67), making the new deadline April 24, 2023.

On April 3, 2023, Plaintiffs' counsel sent Defendants' counsel proposed stipulated findings of fact. On April 20, 2023, Defendants' counsel responded with a redline of proposed

changes. Counsel for the parties have also discussed a potential stipulation as to the authenticity of certain documents to be presented at trial. The parties need additional time to reach agreement on these matters, as well as agreed-upon conclusions of law before they can submit the joint pretrial order. As a result, the parties stipulate and agree to extend the deadline to file the joint pretrial order by thirty (30) days, to and including May 24, 2023.

This is the fifth stipulation for extension of time related to the joint pretrial order. The parties represent that this stipulation is made in good faith and not for the purpose of delay.

RESPECTFULLY SUBMITTED this 24th day of April 2023.

/s/ Debbie Leonard
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IT IS SO ORDERED:


RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 25th day of April, 2023.